

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

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**KENNETH OKONSKI, *et al.***, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

**PROGRESSIVE CASUALTY  
INSURANCE COMPANY,**

Defendant.

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**Case No. 1:23-CV-01548-PAG**

**Hon. Patricia A. Gaughan**

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**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, EXPENSES, AND CLASS  
REPRESENTATIVE SERVICE AWARDS**

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Pursuant to Fed. R. Civ. P. 23(e), Plaintiffs Kenneth Okonski, Bradley Okonski, Edward Reis, Tosif Khan, Kulsoom Tosif, Eduardo Barbosa, Rebecca Johnson, Stephen Johnson, Roxanne Trigg, Giovanni Madaffari, and Dodie Waden ("Plaintiffs") respectfully move this Court for an order awarding (1) \$1,072,500.00 for attorneys' fees (thirty three percent (33%) of the \$3,250,000 common fund); (2) \$22,879.21 for reimbursement of costs and expenses incurred in the litigation; and (3) Service Awards of \$2,000 for each Class Representative. The legal and factual bases supporting this Motion are fully set forth in Plaintiffs' Memorandum in Support of Motion for Approval of Attorneys' Fees, Expenses, and Class Representative Service Awards and the Declaration of Gary M. Klinger in Support of Plaintiff's Motion for Attorneys' Fees, Expenses, and Class Representative Service Awards ("Klinger Decl.") (attached as **Exhibit 1**) and Exhibits thereto, as well as Plaintiffs' Memorandum in Support of Motion for Preliminary Approval of Class Action Settlement Agreement [ECF No. 42], incorporated herein by reference. A proposed

Order granting this Motion will be provided as an attachment to the Motion for Final Approval of the Class Action Settlement due to be filed no later than February 11, 2025.

Dated: January 3, 2025

Respectfully submitted,

/s/ Gary M. Klinger

Gary M. Klinger (*pro hac vice*)

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Plaintiffs and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2025, a copy of the foregoing was served via electronic filing in the ECF system.

/s/ Gary M. Klinger  
Gary M. Klinger